

Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections in view of the remarks below.

### REMARKS

The examiner has rejected claim 20, the only independent claim, under 35 USC 103(a) as being obvious over the combination of Takeda et al. and Ohuchi et al. The examiner has failed to present a *prima facie* case of obviousness, because the examiner has failed to identify in the combination of the Takeda et al. and Ohuchi et al. references each and every element of claim 20.

The examiner has taken the position that the material filling the via 14 is the same as the claimed "metal interconnections" called for by claim 20. This is an unreasonably broad construction of the term "metal interconnections." One of ordinary skill in the art would understand that, as defined in the specification, the term "metal interconnections" as used in claim 20 refers to a metal interconnection pattern or wiring pattern that would reasonably only correspond to the electrodes 6 and the conductive leads 8 shown in Fig. 8 of the Takeda et al. reference and not the material in via 14. Unlike the claimed device, the electrodes 6 and leads 8 of Takeda et al. are not formed directly on the bottom surface of the sealing resin member, but the electrodes 6 and leads 8 of Takeda et al. are formed on a flexible substrate 4 (see column 7, lines 9-19 of Takeda et al.). Accordingly, Takeda et al. fails to disclose an element of claim 20. This claimed element is similarly not disclosed in Ohuchi et al., and therefore the combination of Takeda et al. and Ohuchi et al. fails to establish a *prima facie* case of

obviousness. Accordingly, the rejection of claim 20 is improper and should be withdrawn.

Hotta et al. (USP 6,023,096) is only cited to show the use of a seal resin containing an inorganic filler and does not remedy the deficiencies of the Takeda et al. and Ohuchi et al. references.

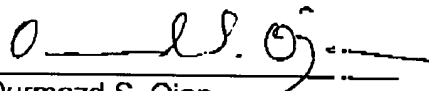
Therefore, the rejection of claims 21, 22, 27 39, which are dependent directly or indirectly from claim 20 and have all of the features of claim 20, is also improper and should be withdrawn.

Therefore, the applicant respectfully submits that the present application is in condition for allowance and a notice to that effect is earnestly solicited.

If in the Examiner's opinion that is not the case, the Applicant asks that the Examiner kindly contact the undersigned by telephone in an effort to resolve any outstanding issues as expeditiously as possible.

Respectfully submitted,

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